

THE HONORABLE DAVID G. ESTUDILLO

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TOMMY BROWN,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00680-DGE

STIPULATED ORDER TO EXTEND
CASE DEADLINES

NOTE ON MOTION CALENDAR:
OCTOBER 18, 2023

STIPULATION

The Parties mutually agree to alter various schedule deadlines, pursuant to Fed. R. Civ. P. 6 and Local Civil Rule 10(g), and for the following reasons, Plaintiff Tommy Brown (“Plaintiff”) and Defendants Transworld Systems Inc. (“TSI”), Patenaude & Felix, APC (“P&F”), U.S. Bank National Association (“U.S. Bank”), National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2007-1, and National Collegiate Student Loan Trust 2007-2 (collectively, “the Trusts,” and together with TSI, P&F, and U.S. Bank, “Defendants”), hereby stipulate and agree as follows:

STIPULATION AND [PROPOSED] ORDER TO
EXTEND CASE DEADLINES – 1
(No. 2:20-cv-00680-DGE)

1 1. The Parties previously stipulated to proposed deadlines for Plaintiff's motion for
 2 class certification and any dispositive motion relating to loan ownership, which the Court
 3 adopted in its Order of April 30, 2023. (Dkt. Nos. 139, 145). Since that stipulation, the Parties
 4 have worked together expeditiously to work toward completing the discovery required for
 5 Plaintiff's motion for class certification and dispositive motion(s) relating to loan
 6 ownership. The Parties have exchanged written discovery, are working to complete document
 7 discovery, and conduct multiple depositions. Given the number of defendants and witnesses in
 8 the case, the Parties still have a substantial amount of discovery to complete.

9 2. Accordingly, the Parties have agreed to stipulate to an extension of the current
 10 case deadlines to accommodate the remaining discovery as follows:

EVENT	SCHEDULED DATE	RESCHEDULED DATE
Defendants' disclosure of experts relating to class certification and disclosure of available deposition dates	October 30, 2023	January 30, 2024
Hearing Date for Defendant Patenaude & Felix, APC's Motion to Deny Class Allegations (ECF No. 144); (ECF No. 148)	November 10, 2023	February 12, 2024
Discovery deadline for class certification fact issues	November 29, 2023	March 1, 2024
Plaintiff's disclosure of rebuttal experts re: class certification and disclosure of available deposition dates for rebuttal expert	November 29, 2023	March 1, 2024

STIPULATION AND [PROPOSED] ORDER TO
 EXTEND CASE DEADLINES
 (No. 2:20-cv-00680-DGE) –2

1	Defendants' disclosure of rebuttal experts re:	January 5, 2024	April 5, 2024
2	class certification and disclosure of available		
3	deposition dates for rebuttal expert		
4	Deadline to complete expert depositions	January 28, 2024	April 29, 2024
5	Plaintiff's motion for class certification due	February 27, 2024	May 28, 2024
6	Any defendant may file a dispositive motion	February 27, 2024	May 28, 2024
7	relating to loan ownership related to Plaintiff		
8	due		
9	Defendants' response to Plaintiff's motion for	March 28, 2024	June 28, 2024
10	class certification due		
11	Plaintiff's response to any dispositive motion	March 28, 2024	June 28, 2024
12	relating to loan ownership related to Plaintiff		
13	due		
14	Plaintiff's reply to motion for class	April 26, 2024	July 26, 2024
15	certification due		
16	Any reply on motion relating to loan	April 26, 2024	July 26, 2024
17	ownership related to Plaintiff due		
18	Hearing on motion for class certification and	To be set by the	To be set by the
19	Trusts' motion relating to loan ownership	Court	Court
20	Class notice and opt-out period, expert	To be set by the	To be set by the
21	disclosures relating to merits, fact discovery,	Court after ruling on	Court after ruling
22	all other dispositive motions, pre-trial and trial	class certification	on class
23	deadlines	and loan ownership,	certification and
24		if needed.	loan ownership, if
25			needed.
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STIPULATION AND [PROPOSED] ORDER TO
 EXTEND CASE DEADLINES
 (No. 2:20-cv-00680-DGE) –3

1 The extension of the above deadlines does not alter or modify any other rights or
2 responsibilities of the Parties except as stated herein permitted by law or under the Federal Rules
3 of Civil Procedure, or the Local Civil Rules.

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5 It is so ordered.

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7 Dated this 23rd day of October 2023.

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12 David G. Estudillo
13 United States District Judge
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